

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JANE DOE, for herself and the class,

Plaintiff,

v.

THE CHILDREN'S HOSPITAL
CORPORATION,

Defendant.

Case No.: 1:25-cv-10343-PBS

JOINT STATUS REPORT

Pursuant to the Court's October 17, 2025 Order (Doc. No. 46), Plaintiff Jane Doe ("Plaintiff") and Defendant The Children's Hospital Corporation ("Defendant") (jointly, the "Parties"), through their undersigned counsel, jointly submit this status report.

The Parties continue to engage in post-mediation discussions regarding a potential resolution of this matter. Accordingly, the Parties request an additional 14-day continuance of the litigation to continue their discussions and propose to file a joint status report updating the Court on or before December 1, 2025.

As the Parties previously reported (Doc. No. 43), Plaintiff filed on October 17, 2025 a motion to amend her complaint (Doc. No. 44, Doc. No. 45), which Defendant opposes. The Parties respectfully request the continued temporary deferral of further briefing or argument on the pending motions in this case, including Defendant's motion to dismiss (Doc. No. 22), until they have had an opportunity to complete their settlement discussions.

Dated: November 17, 2025

JANE DOE, for herself and the class

By: Patrick J. Vallely

Edward F. Haber
Michelle H. Blauner
Patrick J. Vallely
SHAPIRO HABER & URMY LLP
One Boston Place, Suite 2600
Boston, MA 02108
Tel.: (617) 439-3939
ehaber@shulaw.com
mblauner@shulaw.com
pvallely@shulaw.com

Attorneys for Plaintiff

THE CHILDREN'S HOSPITAL
CORPORATION

By: Lisa Oliver White

Lisa Oliver White, BBO# 666841
Shook, Hardy & Bacon L.L.P.
One Federal Street, Suite 2620
Boston, MA 02110
Tel: (617) 531-1411
lowwhite@shb.com

Tammy B. Webb (*pro hac vice*)
Shook, Hardy & Bacon L.L.P.
555 Mission Street, Suite 2300
San Francisco, CA 94105
Tel: (415) 544-1900
twebb@shb.com

Jad Sheikali (*pro hac vice*)
Tara D. Kennedy (*pro hac vice*)
Avery M. Epstein (*pro hac vice*)
Shook, Hardy & Bacon L.L.P.
111 South Wacker Drive
Chicago, IL 60606
Tel: (312) 704-7700
jsheikali@shb.com
tkennedy@shb.com
aepstein@shb.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Lisa Oliver White, do hereby certify that on November 17, 2025, a true and correct copy of the foregoing document was served upon all counsel of record via the CM/ECF system of the United States District Court for the District of Massachusetts.

Lisa Oliver White